

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: )  
 ) Case No. 05-63146  
THE QUAY CORPORATION, INC., ) Chapter 11  
 ) Judge Schmetterer  
Debtor/Debtor-in-Possession. )

**NOTICE OF MOTION**

TO: See Attached Service List

PLEASE TAKE NOTICE that on the 22<sup>nd</sup> day of April, 2008, at the hour of 11:30 a.m., or as soon thereafter as counsel can be heard, I shall appear before the Honorable Jack B. Schmetterer, Bankruptcy Judge, in room 682 of the United States Bankruptcy Court in the Everett McKinley Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, or before any other Judge who may be sitting in his place and stead and shall present the **Motion for Entry of Final Decree**, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in compliance therewith.

AT WHICH TIME and place you may appear if you so see fit.

/s/Jeffrey C. Dan  
Crane, Heyman, Simon, Welch & Clar  
135 S. LaSalle St., Suite 3705  
Chicago, Illinois 60603  
(312) 641-6777

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn on oath deposes and states that a copy of the foregoing Notice and Motion was caused to be served by First Class Mail properly addressed and postage prepaid to all parties on the attached service list, on the 25<sup>th</sup> day of March 2008 before the hour of 5:00 p.m.

/s/Jeffrey C. Dan

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Attn: Victor Cuellar  
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Lincolnwood, IL 60712

Air Services Company  
108 Gateway Road  
Bensenville, IL 60106

Allied Waste Services  
PO Box 9001154  
Louisville, KY 40290-1154

American Express  
Box 0001  
Los Angeles, CA 90096-0001

Arcadia Press, Inc.  
10915 Franklin Ave.  
Franklin Park, IL 60131

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Franklin Park, IL 60131

Arem Container  
6153 W. Mulford  
Niles, IL 60714

Arem Container & Supply Co.  
6153 W. Mulford  
Niles, IL 60714

Arlington Disposal  
PO Box 916061  
Fort Worth, TX 76191-6061

Assured Pest Control  
2506 Royal Lytham Street  
Saint Charles, IL 60174

Bell Flavors & Fragrances, Inc.  
500 Academy Drive  
Northbrook, IL 60062

Bell's Forklift Repair, Inc.  
PO Box 396  
Locust Grove, GA 30248

Buckeridge Door Co., Inc.  
15 East University Drive  
Arlington Heights, IL 60004-1871

Catalina Properties  
19792 MacArthur Blvd., #265  
Irvine, CA 92612

ChevronTexaco Corporation  
6001 Bollinger Canyon Rd.  
San Ramon, CA 94583

Chr. Hansen's Laboratory, Inc.  
9015 West Maple St.  
PO Box 14428  
Milwaukee, WI 53214-4298

City of Alexander City  
Business License  
PO Box 552  
Alexander City, AL 35011

City of Decatur  
c/o SouthTrust Bank, Drawer 1121  
PO BOX 830620  
Birmingham, AL 35283-0620

Cole Taylor Bank  
111 W. Washington, #400  
Chicago, IL 60602

Concentra Medical Centers  
200 Trade Port Blvd, #211  
Atlanta, GA 30354

Conference Plus  
2509 Paysphere Circle  
Chicago, IL 60674

Consumers Vinegar  
4723 S. Washtenaw  
Chicago, IL 60632

Crave Bros. Farmstead Cheese  
W11555 Torpy Road  
Waterloo, WI 53594

Cryovac  
PO Box 91279  
Chicago, IL 60693

Hector Cuellar  
c/o Quay Corp  
19782 McArthur Blvd., #265  
Irvine, CA 92612

D&G Trucking Company  
463 S. Prospect Ave.  
Roselle, IL 60172

Danisco Cultor USA Inc.  
201 New Century Parkway  
New Century, KS 66031

DeKalb County Georgia  
Treasury & Accounting Services  
PO Box 100001  
Decatur, GA 30031-7001

DeKalb County Tax Commissioner  
PO Box 10004  
Decatur, GA 30031-7004

Dependable Fire Equip., Inc.  
60 LeBaron St  
Waukegan, IL 60085-3025

Division Center  
c/o JSC Realty Services Inc.  
5440 Harvest Hill Rd., #101  
Dallas, TX 75230

E-Z Spuds  
2223 Washington Street  
Evanston, IL 60202

El Carmen Imports  
1620 N. Kolamr Ave  
Chicago, IL 60639

El Superior Chorizos, LLC  
233 S. Erie St, #400  
Chicago, IL 60611

El Superior Mexican Foods  
920 W. Fulton St.  
Chicago, IL 60607

Elite Waste Industries  
PO Box 38319  
Houston, TX 77238

Evans Food Products  
4118 S. Halsted Street  
Chicago, IL 60609-2694

Federal Express  
Lockbox 360353, Room 154-0455  
500 Ross Street  
Pittsburgh, PA 15262

Flavorchem  
1525 Brook Drive  
Downers Grove, IL 60515

Garcia Foods, Inc.  
PO Box 13280  
1802 Jackson Keller  
San Antonio, TX 78213-0280

Gelatin Desserts & Paletas  
PO Box 4738  
Houston, TX 77210-4738

Goldthorn Sales & Marketing  
1425 Knottingham Drive  
Little Elm, TX 75068

Great Lakes Milk Products, Inc.  
3000 West North Avenue  
Melrose Park, IL 60160

H&B Packaging  
702 Forrest  
Waco, TX 76704

Hector Cuellar  
10 Morning Light  
Newport Coast, CA

Houston Produce Center  
3114 Produce Row  
Houston, TX 77023

Houston Produce Center  
Buys 1-3, Building D  
Houston, TX

Idealease of Atlanta  
4571 Buford Hwy  
Norcross, GA 30071

Import & Export del Sur, Inc.  
2532 W. Warren Blvd.  
Chicago, IL 60612

Instant Whip Foods  
1535 North Cicero Ave.  
Chicago, IL 60651

InterCall  
PO Box 281866  
Atlanta, GA 30384-1866

Intercall  
c/o West Asset Management  
PO Box 105817  
Atlanta, GA 30348  
J Bar B Foods  
100 Main  
Waelder, TX 78959

Johnstone Supply  
6401 Chestnut Street  
Louisburg, KS 66053

Katalina Enterprises  
19782 McArthur Blvd., #265  
Irvine, CA 92612

La Flor de Jalisco  
Mr. Roberto Ramirez  
4935 W. Fullerton Ave.  
Chicago, IL 60639

Label Tek, Inc.  
1217 S. Bridge Street  
Yorkville, IL 60560

Laser Nework, Inc.  
8 Horizon Ave.  
Venice, CA 90291

Lease Dimensions  
PO Box 74186  
Cleveland, OH 44194-4186

Lifeway Food, Inc.  
6431 W. Oakton Street  
Morton Grove, IL 60053

Mahoney Environmental  
2202 Mound Road  
Joliet, IL 60436

Martinez Imports  
4417 W. 55th St., Apt. 3B  
Chicago, IL 60632

MCI WorldCom  
PO Box 856059  
Louisville, KY 40285-6059

McMaster-Carr Supply Co.  
PO Box 7690  
Chicago, IL 60680-7690

Mexican Cheese Producers  
1625 10th Street, Suite 205  
Monroe, WI 53566

Nextec Operating Corp.  
3415 S. Sepulveda Blvd., Suite 130  
Los Angeles, CA 90034

NICOR Gas  
Attn: Paul C. Gracey, Jr., Esq.  
1844 Ferry Rd  
Naperville, IL 60563

Nicor Gas  
PO Box 416  
Aurora, IL 60568-0001

Novation  
2 N. 8th Street - Suite 100  
PO Box 161114  
Manitowoc, WI 54221-1614

NT Logistics  
5204 Tennyson Pkwy, #200  
Plano, TX 75024

Office Depot  
Dept 56-4200995933  
Columbus, OH 43218-2378

Onyx Waste Services, Inc.  
2800 Shermer Road  
Northbrook, IL 60062

Packaging Technologies  
807 West Kimberly Road  
Davenport, IA 52806

Paragon Manufacturing, Inc.  
2001 N. 15th Avenue  
Melrose Park, IL 60160

Phil-Mart Transportation  
PO Box 157  
31 Harrison Street  
Braselton, GA 30517

Poly Plastics, Inc.  
1751 S. Interstate 45  
PO Box 402  
Ferris, TX 75125

Preferred Transit, Inc.  
PO Box 199  
Monroe, WI 53566

Productos Mama Lycha  
4442 W. 12th Street  
Houston, TX 77055

Quality Snack Foods, Inc.  
404 S. Normal Ave.  
Chicago, IL 60609

Quill Corporation  
100 Schelter Rd  
Lincolnshire, IL 60069

Reisner Packaging Inc.  
339 W. River Road  
Building A, Suite B  
Elgin, IL 60123

Robert Rosa  
10850 Cortland Ln  
Huntley, IL 60142

San Antonio Packing Company  
1922 S. Laredo  
San Antonio, TX 78207

Shefsky & Froelich  
111 E. Wacker Dr., #2800  
Chicago, IL 60601

South Water Market, Inc.  
2525 South Blue Island Ave  
Chicago, IL 60608

Sprint PCS  
PO Box 219718  
Kansas City, MO 64121-9718

St. Charles Trading  
650 N. Raddanta Road  
Batavia, IL 60510

Stallings  
2314 Portsmouth  
Houston, TX 77098

STAMAR Packaging Inc.  
1415 Enterprise Drive  
Romeoville, IL 60446

State of Illinois Boiler Safety  
1035 Stevenson Drive  
Springfield, IL 62703-4599

State of Illinois-Boiler Safey  
1035 Stevenson Drive  
Springfield, IL 62703-4599

Superior Knife Inc.  
8120 N. Central Park Ave.  
Skokie, IL 60076

Superior Packaging, Inc.  
2810 Panorama Drive  
Carrollton, TX 75007

Tampico Graphics  
1919 South Blue Island Avenue  
Chicago, IL 60608

Terminix International  
PO Box 870849  
Stone Mountain, GA 30087-0022

Texaco  
PO Box 9010  
Des Moines, IA 50368-9010

Texas Chili Company  
3013 N. Jones  
Fort Worth, TX 76164

Torkelson Cheese Co.  
Hwy 73 North  
9453 Louisa Rod  
Lombard, IL 60148

Torkelson's Prairie Hill  
N398 Twin Grove Road  
Monroe, WI 53566

U.S. Department of Agriculture  
Food Safety & Insp. Service  
21526 Network Place  
Chicago, IL 60673-1215

Urschel Laboratories, Inc.  
PO Box 96319  
Chicago, IL 60693-6319

Victor Cuellar  
c/o The Quay Corp.  
7201 N. Capital Drive  
Lincolnwood, IL 60712

Village of Skokie  
5127 Oakton St  
Skokie, IL 60077

W & W Dairy, Inc.  
c/o Dave W  
405-18th Avenue  
Monroe, WI 53566

Welding Apparatus Co., Inc.  
1668 N. ada St.  
Chicago, IL 60622

Wilshire Country Club  
301 N. Rossmore Ave.  
Los Angeles, CA 90004

Wisconsin Cheese Group  
36909 Treasury Center  
Chicago, IL 60694-6900

XO Communications Services  
PO Box 5738  
Carol Stream, IL 60197-5738

Zep Manufacturing  
13237 Collections Center Drive  
Chicago, IL 60693

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: )  
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THE QUAY CORPORATION, INC., ) Chapter 11  
 ) Judge Schmetterer  
Debtor/Debtor-in-Possession. )

**MOTION FOR ENTRY OF FINAL DECREE**

To the Honorable Jack B. Schmetterer, Bankruptcy Judge:

Now comes the Debtor, THE QUAY CORPORATION, INC. ("Debtor"), by and through its attorneys, and in support of its Motion for Entry of Final Decree, respectfully states as follows:

1. On October 18, 2005, the Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
2. No trustee or examiner has been appointed to serve in this Chapter 11 case. However, an official committee of unsecured creditors ("Committee") has been formed and is actively represented by counsel.
3. On August 15, 2006, the Debtor filed its Plan of Reorganization and supporting Disclosure Statement. On November 6, 2006, the Debtor filed its First Amended Plan of Reorganization and supporting First Amended Disclosure Statement. On May 18, 2007, the Debtor filed its Second Amended Plan of Reorganization ("Amended Plan") and on May 29, 2007 the Debtor filed its supporting Second Amended Disclosure Statement. On or about July 17, 2007, this Court entered an Order Confirming the Debtor's Amended Plan.
4. The Plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code.

5. To date, the Debtor has paid in excess of forty percent (40%) of the allowed claims and will continue to make payments according to the Second Amended Plan over a five (5) year period until allowed claims are paid in full plus interest.

6. By this Motion, the Debtor requests that this Court reserve jurisdiction to reopen this case to enforce the Amended Plan, upon notice and motion, for good cause shown.

7. The Debtor requests the entry of a Final Decree pursuant to Rule 3022 of the Rules of Bankruptcy Procedure.

WHEREFORE, THE QUAY CORPORATION, INC., Debtor, prays for the entry of a Final Decree closing this Chapter 11 case and for such other relief as may be just and appropriate.

Respectfully submitted,

THE QUAY CORPORATION, INC.  
Debtor

BY: /s/Jeffrey C. Dan  
One of Its Attorneys

**DEBTOR'S COUNSEL:**

DAVID K. WELCH, ESQ. (Atty. No. 06183621)  
ARTHUR G. SIMON, ESQ. (Atty. No. 03124481)  
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